

EX PARTE OR LATE FILED

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VIA COURIER

ORIGINAL

EX PARTE

FILED/ACCEPTED
FEB 21 2008
Federal Communications Commission
Office of the Secretary

February 21, 2008

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to
47 U.S.C. § 160(c) in the Phoenix Metropolitan Statistical Area - WC Docket No.
07-97*

Dear Ms. Dortch:

Qwest Corporation hereby submits the attached *ex parte* and request for confidential treatment (pursuant to the relevant Protective Orders) of certain confidential and highly confidential information included in the *ex parte*, in the above-captioned proceeding.

One copy of the non-redacted version is being submitted; and two copies of the redacted version are being submitted. For both the redacted and non-redacted versions, an extra copy is provided to be stamped and returned to the courier. Both the redacted and non-redacted versions of the *ex parte* are being served on Staff of the Commission's Wireline Competition Bureau as indicated below. This cover letter does not contain any confidential information.

If you have any questions concerning this submission, please contact me using the information above.

Sincerely,

/s/ Melissa E. Newman

Attachments

cc: (via e-mail)
Denise Coca (denise.coca@fcc.gov)

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Ms. Marlene H. Dortch
February 21, 2008

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Daphne E. Butler
Corporate Counsel

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VIA COURIER

EX PARTE

February 21, 2008

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to
47 U.S.C. § 160(c) in the Phoenix Metropolitan Statistical Area – WC Docket No.
07-97*

Dear Ms. Dortch:

Qwest Corporation (“Qwest”) hereby requests confidential treatment of certain information included in the associated *ex parte*. Included is confidential and highly confidential information.

The type of confidential information included (among other similar kinds of data) references estimates by Qwest of its share of residential lines and cable’s share of the mass market for telephone services in the Phoenix, Arizona Metropolitan Statistical Area (“MSA”). The highly confidential information includes an updated version of Exhibit 2 that shows (by wire center) competitive local exchange carrier lines provided via Qwest wholesale products for the Phoenix MSA.¹

The confidential information is submitted pursuant to the June 1, 2007 First Protective Order (22 FCC Rcd 10129, DA 07-2292) in WC Docket No. 07-97. The highly confidential information is submitted pursuant to the June 1, 2007 Second Protective Order (22 FCC Rcd 10134, DA 07-2293) in WC Docket No. 07-97. As required by the First and Second Protective Orders, the *ex parte* with confidential information (that is, the non-redacted version) is marked **CONFIDENTIAL – SUBJECT TO FIRST PROTECTIVE ORDER IN WC DOCKET NO. 07-97 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**, and the highly confidential updated version of Exhibit 2 is marked **HIGHLY CONFIDENTIAL – SUBJECT**

¹ Exhibit 2 was submitted initially to the Commission on April 27, 2007.

Ms. Marlene H. Dortch
February 21, 2008

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TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 07-97 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION. Pursuant to the First and Second Protective Orders, Qwest requests that the non-redacted version of this *ex parte* (containing confidential and highly confidential information) be withheld from public inspection.

Qwest considers this confidential and highly confidential information as being extremely competitively-sensitive in nature. This type of information is "not routinely available for public inspection" pursuant to both Commission rules 47 C.F.R. §§ 0.457(d) and 0.459 (as Qwest explained and for which it provided legal justification in its Request for Confidential Treatment and Confidentiality Justification submitted with its four Petitions for Forbearance (including the one for the Phoenix, Arizona MSA) on April 27, 2007.

Qwest is simultaneously submitting, under separate covers, a non-redacted and a redacted version of the associated *ex parte*. The redacted version of the *ex parte* is marked "**REDACTED - FOR PUBLIC INSPECTION**". Both the redacted and non-redacted versions of the *ex parte* are the same except that in the non-confidential version the confidential information has been omitted and the updated version of Exhibit 2 is not included. This cover *ex parte* letter contains no confidential information.

If you have any questions concerning this submission, please call me on 303-383-6653.

Sincerely,

/s/ Daphne E. Butler

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Daphne E. Butler
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February 21, 2008

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Phoenix Metropolitan Statistical Area, WC Docket No. 07-97*

Qwest Corporation ("Qwest") files this *ex parte* to update data provided in the Brigham/Teitzel Declaration filed by Qwest on April 27, 2007. Specifically, Qwest is updating data for the Phoenix Metropolitan Statistical Area ("MSA") regarding: (1) Qwest access lines; (2) competitive local exchange carrier ("CLEC") facilities-based lines, including an estimate of cable operators' share of these lines; (3) Qwest wholesale lines provided to CLECs; and (4) wireless-only (*i.e.*, "cut-the-cord") households. Qwest believes that the Federal Communications Commission ("Commission") should consider this updated data. The reasons for the Commission's refusal to reconsider Verizon's updated 2007 data do not apply here. First, Qwest's updated data includes all of Qwest's line counts, whereas the Commission found that Verizon's data failed to include MCI's line counts. Moreover, Qwest's data are being filed two months before the statutory twelve month deadline for action on our petition, which will allow all interested parties sufficient time to review, analyze and comment on Qwest's data.¹

In the *Verizon 6 MSA Order*, the Commission adopted a market share test, requiring that the incumbent hold less than 50 percent market share for mass market telephone services in order

¹ See *In the Matter of Petitions of the Verizon Telephone Companies for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Boston, New York, Philadelphia, Pittsburgh, Providence and Virginia Beach Metropolitan Statistical Areas*, Memorandum Opinion and Order, 22 FCC Red 21293, 21308 n.91 (2007) ("*Verizon 6 MSA Order*"), appeal pending *sub nom. Verizon Telephone v. FCC*, No. 08-1012 (D.C. Cir., filed Jan. 14, 2008).

to forbear from the requirement of loop and transport unbundling.² This is a departure from prior unbundling decisions. Before the *Verizon 6 MSA Order*, the Commission's unbundling decisions focused on a competitor's ability to compete, rather than market share achieved upon entry. For example, the Commission defined impairment to focus on whether lack of a network element "poses a barrier or barriers to entry, including operational and economic barriers, that are likely to make entry into a market uneconomic."³ Similarly, the D.C. Circuit stated in its *USTA II* decision that the Commission cannot "simply ignore facilities deployment along similar routes when assessing impairment."⁴

While Qwest believes that this new market share test is ill-advised, it is noteworthy that the data available to Qwest suggest that Qwest meets the less than 50 percent test in the Phoenix MSA. Qwest evaluated its own residential access line counts, along with CLEC residential line counts (*i.e.*, including estimated cable, as well as actual resale, and QPP lines) and "cut-the-cord" wireless customer data. Based on this analysis, and as shown in the Appendix, Qwest estimates that its share of residential lines in the Phoenix MSA is now less than **[begin confidential]** **[end confidential]** percent of the Phoenix, Arizona MSA. Qwest estimates this market share by employing the two-step procedure used in Appendix B of the *Verizon 6 MSA Order*, with one modification. As described more fully below in Section C, Qwest assumes that 13.6 percent of households have cut-the-cord.⁵

Qwest has previously provided estimates for CLEC residential facilities-based access lines in the Phoenix MSA.⁶ As described below in Section B, Qwest updates that figure to **[begin confidential]** **[end confidential]**. Of those, Qwest estimates that more than **[begin confidential]** **[end confidential]** are provided by cable operators. Qwest takes a

² See *id.* at 21307-08 ¶¶ 27, 30 and 36.

³ See, e.g., *In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Deployment of Wireline Services Offering Advanced Telecommunications Capability*, Report and Order and Order on Remand and Further Notice of Proposed Rulemaking, 18 FCC Rcd 16978, 17035 ¶ 84 (2003), corrected by *Triennial Review Order Errata*, 18 FCC Rcd 19020 (2003) (subsequent history omitted).

⁴ *USTA v. FCC*, 359 F.3d 554, 575 (D.C. Cir. 2004) ("*USTA II*").

⁵ As discussed more completely below in Section C, the Centers for Disease Control estimates that 13.6% of households exclusively subscribe to a mobile wireless service. This is a conservative estimate for the Phoenix MSA, since as described in Section C, other data suggest that the proportion of wireless subscribers that have "cut-the-cord" in Phoenix well exceeds the national average.

⁶ See Declaration of Robert H. Brigham and David L. Teitzel Regarding the Status of Telecommunications Competition in the Phoenix, Arizona Metropolitan Statistical Area, attached to Qwest's petition ¶ 23 ("*Brigham/Teitzel Declaration*").

conservative, aggregated reporting approach here in light of public carrier challenges to the use and disclosure of carrier line information in the Verizon 6 MSA proceeding.⁷ Within that proceeding, Cox made similar arguments.⁸

However, the Commission must understand that the white page listings data only allow Qwest to calculate an estimate of CLEC and cable telephony facilities-based lines for the Phoenix MSA. Ultimately, the most accurate source of cable operators' line counts is the cable operators themselves. Qwest therefore urges the Commission to obtain access line data from Cox as it did in the Verizon 6 MSA proceeding and the Omaha proceeding. Similarly, although the Commission chose not to verify other CLEC facility-based lines in the Verizon 6 MSA proceeding, Qwest believes that the Commission should take the simple step of verifying facility-based lines provided by the non-cable CLECs in the Phoenix MSA. Ignoring this segment of the market results in an incomplete market analysis.

A. Qwest Access Lines

In the fifth paragraph of the Brigham/Teitzel Declaration, Qwest provided a table reflecting the dramatic decline in its retail residential, business and public coin access line base in the Phoenix MSA between December 2000 and December 2006. Table 1 below updates that data and shows that between December 2006 and December 2007 Qwest has experienced even further losses across all categories of retail access lines in the Phoenix MSA as competitive forces continue to intensify in that market.⁹

⁷ See Broadview Networks, Inc., Covad Communications Group, NuVox Communications, Inc., and XO Communications, Inc. Motion to Compel Disclosure of Confidential Information Pursuant to Protective Order, WC Docket No. 06-172, filed Oct. 16, 2006; ACN Communications Services, Inc., *et al.*, Motion to Dismiss, WC Docket No. 06-172, filed Oct. 16, 2006.

⁸ See Comments of Cox Communications, Inc., on Motion to Compel Disclosure of Confidential Information Pursuant to Protective Order and on Motion to Dismiss, WC Docket No. 06-172, filed Oct. 30, 2006.

⁹ For instance, Cox is now aggressively targeting the small and mid-sized business market. See <http://www.coxbusiness.com/pressroom/pressreleases/2007-1130.html>, Cox Leads Industry with 200,000 Business Telecom Customers, released December 3, 2007.

Table 1

Decrease in Qwest Retail Access Lines in the Phoenix MSA
December 2006 to December 2007

-----**Begin Confidential**-----

<u>Retail Service</u>	<u>Dec. 2006</u>	<u>Dec. 2007</u>	<u>Difference</u>	<u>% Decrease</u>
Residential				%
Business				%
Public				%
Total				%

-----**End Confidential**-----

B. Facilities-Based CLEC Lines

In paragraph 23 of the Brigham/Teitzel Declaration, Qwest included an estimate of the number of business lines and the number of residential lines that were provided by facilities-based CLECs¹⁰ in the Phoenix MSA rate centers as of January 2007. As explained in the referenced paragraph, these estimates were derived using white pages listings. Table 2 below updates this data and shows that the estimated number of business and residential lines provided by facilities-based CLECs has grown substantially since January 2007. Facilities-based business lines are growing even more quickly than residential lines.

¹⁰ Qwest defines "facilities-based" as used in this estimate at paragraph 23 of the Brigham/Teitzel Declaration and in footnote 25 of its reply comments. See Reply Comments of Qwest, WC Docket No. 07-97, filed Oct. 1, 2007 at 10 n.25.

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Table 2

Growth in *CLEC Facilities-Based* Lines in the Phoenix MSA
January 2007 to December 2007
As Estimated from White Pages Listings

-----Begin Confidential-----

<u>CLEC Facilities-Based Service</u>	<u>Jan. 2007</u>	<u>Dec. 2007</u>	<u>Difference</u>	<u>% Increase</u>
Residential				%
Business				%
Total				%

-----End Confidential-----

C. “Wireless-Only” Households

Qwest notes the substantial growth in “wireless only” households (*i.e.*, those households that have disconnected wireline telephone service and now rely exclusively on wireless service for their telecommunications needs). At the time Qwest filed its petition, the National Center for Health Statistics (“NCHS”) -- the research source for the data relied upon by the Commission regarding wireless substitution¹¹ -- had just released a report showing that the proportion of households nationwide that had “cut-the-cord” increased to 9.6 percent as of June 2006.¹² Consistent with its past reliance upon the NCHS wireless substitution data, the Commission once again relied upon the most recent NCHS data available in the *Verizon 6 MSA Order*.¹³ The Commission observed that the research from the NCHS for the second half of 2006 showed that 12.8 percent of households were exclusively subscribing to a mobile wireless service, and it used that statistic in the calculation of market share detailed in Appendix B of the *Verizon 6 MSA Order*.¹⁴

¹¹ The National Center for Health Statistics is an organizational component of the Centers for Disease Control.

¹² See ¶ 37 of the Brigham/Teitzel Declaration.

¹³ See *Verizon 6 MSA Order*, 22 FCC Rcd at 21323, Appendix B, n.2.

¹⁴ *Id.*

On December 10, 2007, the NCHS released its preliminary estimates of wireless substitution for the first half of 2007.¹⁵ According to the NCHS report, this "cord cutter" group had grown to an estimated **13.6 percent** by June 2007 -- an increase of four full basis points from June 2006 and nearly one full basis point from December 2006. Further, in its recently released report on the status of wireless competition the Commission acknowledged that Phoenix is among those U.S. cities where people have been replacing their landlines with wireless at rates even greater than the national average.¹⁶ Given this trend, and coupled with the fact that the NCHS's estimate of wireless substitution is based on data from the *first half of 2007* rather than year-end data, Qwest believes 13.6 percent is a very conservative estimate of households in the Phoenix MSA that have "cut-the-cord" as of December 2007. As further support for this conclusion, Qwest notes that the Telephia research referenced by the Commission in paragraph 248 of its wireless competition report released February 4, 2008, indicated that the proportion of Phoenix households that had cut-the-cord as of the second quarter of 2006 was *already* 13.5 percent at that time -- when the national average stood at 9.6 percent.¹⁷ As of July 2006, U.S. Census data shows that there were approximately 1.62 million households in the Phoenix MSA.¹⁸ Therefore, applying the most current national average "cord cutter" estimate of 13.6 percent -- which Qwest considers to be very conservative for Phoenix -- to the total number of households in the MSA indicates that more than 220,000 households have completely replaced their wireline service with wireless service in the Phoenix MSA.

D. Wholesale Voice Grade Equivalent Lines Purchased by CLECs

As explained in paragraph 22 of the Brigham/Teitzel Declaration, Highly Confidential Exhibit 2 provided the total quantity of Qwest wholesale services purchased by CLECs in each Phoenix MSA wire center as of December 2006, segmented by residential and business line categories. The attached update to Highly Confidential Exhibit 2 demonstrates that the number of CLEC lines provided in the Phoenix MSA via Qwest's wholesale products has increased between December 2006 and December 2007.

¹⁵ Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, January -- June 2007, rel. Dec. 10, 2007.

¹⁶ Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services, WT Docket No. 07-71, Twelfth Report, rel. Feb. 4, 2008 at 109 ¶ 248.

¹⁷ See Brigham/Teitzel Declaration, Exhibit 5 at 5-6.

¹⁸ See <http://www.census.gov/popest/housing/HU-EST2006-4.html>. The Phoenix MSA encompasses Maricopa and Pinal counties.

Ms. Marlene H. Dortch
February 21, 2008

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E. Conclusion

The updated data show that Qwest is continuing to lose access lines, and facilities-based CLECs are continuing to gain access lines. These CLECs had a particularly strong increase in business access lines during 2007. Qwest's share of the mass market continues to fall as intramodal and intermodal competition continues to intensify, approaching the levels seen in Omaha. Where there is such robust competition, the Commission cannot justify continuing to impose the costs of unbundling and dominant carrier regulation.

Respectfully submitted,

/s/ Daphne E. Butler

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APPENDIX

Phoenix MSA - Estimated Residential Market Share

Step 1:

$$\text{Qwest} + \text{CLEC} = (1-.136) * C_{\text{telephone}}$$

Where,

$C_{\text{telephone}}$ = The total number of customers that have telephone service (wireline or wireless)

Qwest = Qwest residential local service customers

CLEC = Qwest Resold Lines + Qwest Residential Platform Service Lines (UNE-P + QPP) + Cable Providers' [Estimated] Residential Access Lines

$$C_{\text{telephone}} = (\text{Qwest} + \text{CLEC}) / (1-.136)$$

Qwest Residential	Redacted	(December 2007 data; see Section A)
CLEC Residential		
Qwest Residential Resold Lines	Redacted	(December 2007 data from updated highly confidential Exhibit 2)
Qwest Residential QPP Lines	Redacted	(December 2007 data from updated highly confidential Exhibit 2)
90% of Estimated Facilities-Based CLEC Residential Lines	Redacted	(Based on December 2007 listings for Phoenix MSA rate centers)
CLEC Total	Redacted	
 $C_{\text{telephone}} = (\text{Qwest} + \text{CLEC}) / (1-.136)$		
<u>Equals:</u>	Redacted	
 Wireless_{CTC} = $C_{\text{telephone}} - \text{Qwest} - \text{CLEC}$		
<u>Equals:</u>	Redacted	

Step 2:

Estimated Qwest Market

Share [Qwest_{MS}] = $[\text{Qwest} + \text{Qwest Wireless}_{\text{CTC}}] / [\text{Qwest} + \text{CLEC} + \text{Wireless}_{\text{CTC}}]$

Equals: **Redacted**

Estimated CLEC + Competitive

Wireless Market Share =

Redacted

Note: Qwest's estimated share of wireless in the Phoenix MSA, per TNS Telecoms = **Redacted** (see footnote 17 in Brigham/Teitzel declaration)
Redacted Redacted Equals: **Redacted**

PHOENIX MSA
 CLEC LINES PROVIDED VIA QWEST WHOLESALE PRODUCTS
 (Data Vintage: December 2007)

Wire Center	CLI#	CLEC BUSINESS LINES					CLEC RESIDENCE LINES			BUSINESS + RESIDENCE				
		UNE-L ¹	EEL ¹	Platform-Based ²	Resale	Total	Platform-Based ²	Resale	Total	UNE-L ¹	EEL ¹	Platform-Based ²	Resale	Total
		(Dec.'07)	(Dec.'07)	(Dec.'07)	(Dec.'07)	(Sum of Col. A thru Col. D)	(Dec.'07)	(Dec.'07)	(Sum of Col. F + Col. G)	(Dec.'07)	(Dec.'07)	(Dec.'07)	(Dec.'07)	(Sum of Col. I thru Col. L)
		A	B	C	D	E	F	G	H	I=A	J=B	K=C+F	L=D+G	M
BEARDSLEY	BRDSAZMA													
BUCKEYE	BCKYAZMA													
CASA GRANDE	CSGRAZMA													
CAVE CREEK	CVCKAZMA													
CHANDLER MAIN	CHNDAZMA													
CHANDLER SOUTH	CHNDAZSO													
CHANDLER WEST	CHNDAZWE													
CIRCLE CITY	CRCYAZNM													
COLDWATER	GDYRAZCW													
COOLIDGE	CLDGAZMA													
DEER VALLEY NORTH	DRVYAZNO													
DUDLEYVILLE	DDVLAZNM													
ELOY	ELOYAZ01													
FLORENCE	FLRNAZMA													
FORT MCDOWELL	FTMDAZMA													
GILA BEND	GLBNAZMA													
GLENDALE	GLDLAZMA													
HIGLEY	HGLYAZMA													
HIGLEY QUEEN CREEK	HGLYAZQC													
KEARNY	KRNYAZMA													
LITCHFIELD PARK	LTPKAZMA													
MAMMOTH	MMTHAZMA													
MARICOPA	MRCPAZMA													
MESA GILBERT	MESAAZGI													
MESA MAIN	MESAAZMA													
NEW RIVER	NWRVAZMA													
ORACLE	ORCLAZMA													
PHOENIX BETHANY WEST	PHNXAZBW													
PHOENIX CACTUS	PHNXAZCA													
PHOENIX EAST	PHNXAZEA													
PHOENIX FOOTHILLS	PHNXAZ81													
PHOENIX GREENWAY	PHNXAZGR													
PHOENIX LAVEEN	PHNXAZLV													
PHOENIX MAIN	PHNXAZMA													
PHOENIX MARYVALE	PHNXAZMY													
PHOENIX MID RIVERS	PHNXAZMR													
PHOENIX NORTH	PHNXAZNO													
PHOENIX NORTHEAST	PHNXAZNE													

PHOENIX MSA
 CLEC LINES PROVIDED VIA QWEST WHOLESALE PRODUCTS
 (Data Vintage: December 2007)

Wire Center	CLI18	CLEC BUSINESS LINES					CLEC RESIDENCE LINES			BUSINESS + RESIDENCE				
		UNE-L ¹	EEL ¹	Platform-Based ²	Resale	Total	Platform-Based ²	Resale	Total	UNE-L ¹	EEL ¹	Platform-Based ²	Resale	Total
		(Dec.'07)	(Dec.'07)	(Dec.'07)	(Dec.'07)	(Sum of Col. A thru Col. D)	(Dec.'07)	(Dec.'07)	(Sum of Col. F + Col. G)	(Dec.'07)	(Dec.'07)	(Dec.'07)	(Dec.'07)	(Sum of Col. I thru Col. L)
		A	B	C	D	E	F	G	H	I=A	J=B	K=C+F	L=D+G	M
PHOENIX NORTHWEST	PHNXAZNW													
PHOENIX PECOS	PHNXAZPP													
PHOENIX PEORIA	PHNXAZPR													
PHOENIX SOUTH	PHNXAZSO													
PHOENIX SOUTHEAST	PHNXAZSE													
PHOENIX SUNNYSLOPE	PHNXAZSY													
PHOENIX WEST	PHNXAZWE													
PINNACLE PEAK	PRVYAZPP													
RIO VERDE	FTMDAZNO													
SAN MANUEL	SNMNAZMA													
SCOTTSDALE MAIN	SCDLAZMA													
SCOTTSDALE SHEA	SCDLAZSH													
SCOTTSDALE THUNDERBIRD	SCDLAZTH													
STANFIELD	STFDAZMA													
SUNRISE	AGFIAZSR													
SUPERIOR	SPRRAZMA													
SUPERSTITION EAST	SPRSAZEA													
SUPERSTITION MAIN	SPRSAZMA													
SUPERSTITION WEST	SPRSAZWE													
TEMPE	TEMPAZMA													
TEMPE MCCLINTOCK	TEMPAZMC													
TOLLESON	TLSNAZMA													
WHITE TANKS	WHTKAZMA													
WHITLOW	WHTLAZMA													
WICKENBURG	WCBGAZMA													
WINTERSBURG	WNBGAZ01													
TOTALS - PHOENIX MSA														

Note 1: Consistent with the methodology ordered by the FCC in its TRRO, wholesale DS1 services are counted at full capacity of 24 DS0s and DS3 services are counted at full capacity of 672 DS0s. Unlike with other wholesale categories, Qwest has no way of determining whether UNE-L and EEL lines are used by the CLEC to serve business customers or residence customers. Because Qwest believes these lines are predominantly being used to serve business customers, they are accounted for in the Business Lines section of this analysis.

Note 2: Platform-based lines shown in this column include the sum of QPP, QLSP and UNE-P lines.